070293-18 1000 CORREST CONVINCE OUTGOING LTR NO. חיסוו EG&G ROCKY F 13RF8003 EG&G ROCKY FLATS, INC. (303) 966-7000 ROCKY FLATS PLANT, P.O. BOX 464. ENJAMIN, A ERMAN, H.S RANCH, D.B June 29, 1993 , 5 LC ARNIVAL GJ AVIS. J.G 160 ANNI BJ. ARMAN, L. K Michael S. Karol Assistant Manager for Facility Operations DOE RFO EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT, SECTION 313, FORM R SUBMITTAL - REVISED 1992 REPORT - TGH-406-93 KENNA, F.G ONTROSE, J.I RGAN, R.V. Enclosed is a revised Form R submittal for 1992 (Enclosure I). This new submittal changes the amount of nitric acid use and adds hydrochloric acid and sulfuric acid to the list .EY. J.H. of toxic chemicals that exceeded reporting thresholds in 1992. We have circled the revisions in red ink according to instructions given in the Environmental Protection LLIVAN, M.T. Agency's "Toxic Chemical Release Inventory Reporting Form R and Instructions." These MNSON, E.H instructions also state that the cover letter must clarify exactly which revisions have been KINSON, R.B LIAMS, S. (ORC) made. Please disregard the earlier copy of the Form R for 1992 transmitted to your offices SON, J. M. on June 18, 1993. The changes to the Form R are necessitated by newly obtained information on chemical use associated with ground water and surface water remediation in Operable Units #1 and #2. This information was inadvertently omitted from our calculations on chemical use. As a Browssord consequence, neither hydrochloric acid nor sulfuric acid exceeded reporting thresholds based on our earlier calculations and the amount of nitric acid use was understated. Our preliminary findings are that the additional chemical use was incurred by subcontractors operating treatment units for Operable Units #1 and #2. These chemicals apparently were procured directly by the subcontractors, circumventing the normal ARES CONTROL system of procurement and delivery of chemicals through the 130 Warehouse. Earlier this year, EG&G developed an action plan (Enclosure II) to respond to a finding by DOE (#93-WM-00S-891-005-007) regarding improper management of chemicals by ASSIFICATION: subcontractors. Full implementation of this plan is designed to prevent delivery of CLASSIFIED chemicals by subcontractors to RFP without appropriate notification to EG&G.

To address immediate concerns on other possible large-quantity chemical users, especially subcontractors, we contacted EG&G program managers for environmental restoration (Operable Units #1, #2, and #4) and pond water treatment systems, discussed chemical use with a representative of J.A. Jones and reviewed a data base on outside tank storage. None of these sources revealed use of large quantities of chemicals in 1992 that was not

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Rev. 9/92)

NFIDENTIAL

HORIZED CLASSIFIER SIGNATURE /

6/29/93

EPLY TO RFP CC NO:

**ADMIN RECORD** 

reflected in the enclosed Form R reports.

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The Form R submittal is being provided in both hard copy and electronic media via the enclosed diskette. Please note that the enclosed Form R has two signature blocks so that DOE, RFO and EG&G Rocky Flats, Inc. may sign concurrently. Also enclosed (Enclosure III) is a letter to the EPCRA Reporting Center (a printout from the diskette sent to us by EPA) that must be signed and attached to the diskette when sent to EPA.

Data contained in this report were compiled by various staff members based on information gathered, in some cases from third parties, and analyzed in accordance with standard techniques and with the application of professional judgement. Based on these assessments, and to the best of our knowledge, the data provided in the Form R report for 1992 is accurate and valid.

We recognize that improvements are needed in our chemical tracking procedures and we are implementing a number of actions to prevent similar problems in our future Tier II and Form R submittals. These actions include:

- A review of all operations involving chemical storage and use in remediation activities will be conducted and a report will be provided to your office by July 16, 1993. Corrective actions will be identified and entered into the Plant Action Tracking system.
- The Chemical Tracking Procedure, a Level 1 procedure governing plantwide implementation of methods to track chemical storage and use, will be completed by September 15, 1993 in accordance with the enclosed action plan (Enclosure III).
- Training will be conducted for management and users on chemical tracking procedures. This training is scheduled for FY94 and is reflected in work package #61601.

We are reviewing our TIER II submittal for 1992 to determine if changes are required to reflect additional chemical storage. Changes in the storage amounts for previously reported chemicals and the addition of new hazardous chemicals to the report may be necessary. Any required changes in the TIER II submittal will be delivered to your office by July 8, 1993.

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If you have any questions regarding the revised Form R submittal, please feel free to contact D.B. Costain of the Chemical Tracking and Control System Division at extension 8528.

T. G. Hedahl, Associate General Manager Environmental and Waste Management EG&G Rocky Flats, Inc.

DBC:pcm

Orig. and 1 cc - M. S. Karol

Enclosures: As Stated (3)